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# South Carolina Department of Natural Resources



August 29, 2006

John E. Frampton  
Director

Mr. G. O'Neal Hamilton  
Chairman  
Public Service Commission of South Carolina,  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

REF: Docket No. 2004-100-E; Progress Energy Carolinas, Inc.  
Florence – Marion – Whiteville, NC Transmission Line  
Dillon, Florence, Horry and Marion Counties

Dear Mr. Hamilton:

Personnel with the South Carolina Department of Natural Resources have received additional information provided by the applicant (copy attached) for the above referenced project, and offer the following comments.

In our May 27, 2004 letter to Mr. Bruce F. Duke of the Public Service Commission (copy attached) our recommendations included the following stipulation:

- 3) Right-of-ways through and adjacent to wetlands should be maintained by hand clearing rather than with chemicals to reduce the potential for contamination of downstream aquatic resources.

We have reviewed the additional information provided by the applicant dated August 21, 2006. In this information, Progress Energy Carolinas states that they use an integrated approach to vegetation management in right-of-ways that includes mowing, hand clearing and herbicide treatment. We have no objection to the project provided that the methods and conditions for vegetation management as described in this information are incorporated into project plans.

Please contact Greg Mixon at the mailing address below or by phone at (803) 896-7767 if you have further questions or need assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Mixon".  
Robert E. Duncan  
Environmental Programs Director

cc: Buzz Bryson - Progress Energy

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MSC SC  
MAIL/ADMS



August 21, 2006

Mr. Greg Mixon  
South Carolina Department of Natural Resources  
5 Geology Road  
Columbia, South Carolina 29212

Subject: Use of Herbicides for Vegetation Maintenance on Rights-of-Way

Dear Mr. Mixon:

Previously, in a letter dated May 27, 2004, reviewing a proposed Progress Energy Carolinas (PEC) transmission line project, the South Carolina Department of Natural Resources (SCDNR) made several recommendations for the project. Among those recommendations was the following:

Rights-of-way through and adjacent to wetlands should be maintained by hand clearing rather than with chemicals to reduce the potential for contamination of downstream aquatic resources.

PEC is requesting that SCDNR agree to the use of herbicides for vegetation control on this transmission line project, as described below.

PEC, during its maintenance of transmission line rights-of-way (ROW), uses an integrated approach. Vegetation control on ROWs must be conducted every 3-4 years, to ensure that required safety clearances between the conductors (wires) and vegetation are maintained. Our approach includes mowing, hand cutting (of individual trees and/or in sensitive areas) and herbicide treatment. The particular method is dependent upon a number of factors, including adjacent development (homes, farms or commercial development), terrain, environmental features (water bodies, natural areas) and others.

In determining which method, or combination of methods to use, PEC ensures that those techniques comply with applicable regulations, permit conditions and/or easement restrictions. Where herbicides are used, PEC ensures that work is done by a certified applicator, that the herbicides are used in accordance with label conditions and that adjacent landowners are aware of such usage.

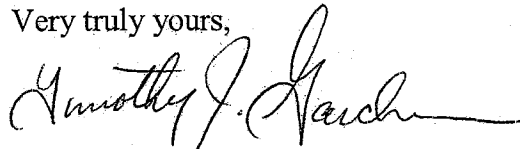
Herbicide usage around waters or wetlands is restricted to those herbicides that are registered and approved for such usage. Herbicide usage has proven to be safe and to have minimal impact on such areas, primarily by limiting vehicular traffic in such areas.

PEC's Herbicide Usage Policy is posted on our external web site (<http://www.progress-energy.com/environment/vegetation/herbicide.asp>), and explains our vegetation management program in greater detail. We encourage you to review that web site and would welcome your thoughts.

We would appreciate SCDNR reconsidering its previous position, and concur with herbicide usage for ROW vegetation maintenance on this transmission line project, when such usage is limited to that described above.

Thank you for this consideration. If you have any questions, please contact either Mr. Buzz Bryson in our Environmental Services Section at 919-546-6637 (office), 919-812-1120 (cell) or [buzz.bryson@pgnmail.com](mailto:buzz.bryson@pgnmail.com) (e-mail), or Mr. George Booth, our Energy Delivery environmental coordinator at 919-546-7323 (office), 919-812-0950 (cell) or [george.booth@pgnmail.com](mailto:george.booth@pgnmail.com) (e-mail).

Very truly yours,

A handwritten signature in cursive script, appearing to read "Timothy J. Gardner", written in black ink.

T. J. Gardner, Lead Forester  
Transmission Maintenance - Carolinas

TJG/wtb

Cc: George Booth  
Buzz Bryson  
Betty Light

# South Carolina Department of Natural Resources



John E. Frampton  
Director

May 27, 2004

Mr. Bruce F. Duke  
Executive Director  
Public Service Commission of SC  
P.O. Drawer 11649  
Columbia, SC 29211

REF: Docket No. 2004-100-E; Progress Energy Carolinas, Inc.  
Florence – Marion – Whiteville, NC Transmission Line  
Dillon, Florence, Horry and Marion Counties

Dear Mr. Duke:

Personnel with the South Carolina Department of Natural Resources have reviewed the above referenced project and evaluated its impact on wildlife and fisheries habitat, wetlands, endangered species, floodplains, water quality, recreation and other factors relating to the conservation of natural resources.

The proposed project consists of the construction and operation of two 230 kV transmission lines. One of the lines begins near the Progress Energy Florence transmission substation near Florence and ends at the Marion transmission substation near Marion, a distance of approximately 29 miles. The second line begins at the Nichols transmission substation and ends at the Whiteville transmission substation near Whiteville, NC, a distance of approximately 6.7 miles. The stated purpose of the proposed lines is to prevent overloading of the existing lines and ensure a continued reliable supply of electric service to homes and businesses in the Florence – Marion – Whiteville, NC areas.

Based on the information provided and a review of topographic maps and aerial photography, the proposed route will cross the Black Creek, the Great Pee Dee River and the Lumber River and several additional wetland areas. The information provided also indicates that the proposed transmission lines will follow existing right-of-ways and will be designed to span or avoid wetland areas where possible. The information indicates that the applicant is coordinating with the U.S. Fish and Wildlife Service to determine the presence or absence of threatened and endangered plant or animal species and their habitats. We recommend that impacts to these species or their habitats be avoided and that additional surveys and mitigation be required if needed.

In order to further reduce potential impacts to natural resources, we also recommend that the following additional stipulations be incorporated into project plans.

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Docket No. 2004-100-E; Progress Energy Carolinas, Inc.  
Florence – Marion – Whiteville, NC Transmission Line  
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- 1) Transmission line construction must be accomplished in existing disturbance corridors where practicable. Upon completion, all disturbed areas must be permanently stabilized with vegetative cover and/or riprap, as appropriate.
- 2) To the greatest extent practicable, clearing of riparian vegetation within wetlands and waters of the U.S. must be conducted manually and low growing, woody vegetation and shrubs must be left intact to maintain stream bank stability and reduce erosion.
- 3) Right-of-ways through and adjacent to wetlands should be maintained by hand clearing rather than with chemicals to reduce the potential for contamination of downstream aquatic resources.
- 4) Stream banks at crossings must be restored after construction has been completed. Disturbed stream banks can be restored by planting woody vegetation and by using bioengineering techniques for stream bank stabilization.
- 5) Construction activities must avoid to the greatest extent practicable, encroachment into any wetland areas outside the transmission line right-of-way.

Sincerely,



Robert E. Duncan  
Environmental Programs Director

cc: Travis Hughes – USACE  
Quinton Epps – SCDHEC  
Jason Ayers – USFWS  
Cary Chamblee - SCDNR